

EXHIBIT 2

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JENNIFER B. CAMPBELL,

Plaintiff,

v.

DISTRICT OF COLUMBIA, *et al.*,

Defendants.

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Civil Action No.: 12-1769 (RC)

VERDICT FORM

**THE JURY MUST UNANIMOUSLY AGREE ON THE ANSWERS TO ALL OF THE
QUESTIONS. THE COMPLETED VERDICT FORM MUST BE SIGNED AND DATED
BY EACH JUROR.**

**1. 42 U.S.C. § 1983 and Fifth Amendment Procedural Due Process:
Deprivation of Liberty Interest**

a. "Reputation-Plus"

A. Did Dr. Campbell prove by a preponderance of the evidence that the District made a false and defamatory statement concerning her?

Yes _____

No _____

If your answer is "Yes," go on to the next question. If your answer is "No," skip to the question about "Stigma or Disability" on the next page (Question 1.b).

B. Did Dr. Campbell prove by a preponderance of the evidence that the District published the false and defamatory statement, **without privilege**, to a third party?

Yes _____

No _____

If your answer is "Yes," go on to the next question. If your answer is "No," skip to the question about "Stigma or Disability" on the next page (Question 1.b).

C. Did Dr. Campbell prove by a preponderance of the evidence that the District's fault in publishing the false and defamatory statement amounted to at least negligence?

Yes _____

No _____

If your answer is "Yes," go on to the next question. If your answer is "No," skip to the question about "Stigma or Disability" below (Question 1.b).

D. Did Dr. Campbell prove by a preponderance of the evidence that the publication of the false and defamatory statement caused her special harm?

Yes _____

No _____

Regardless of your answer, go on to the question about "Stigma or Disability" below (Question 1.b).

b. *"Stigma or Disability"*

Did Dr. Campbell prove by a preponderance of the evidence that the District's release of emails to the press and termination of her employment left a stigma on her and had the broad effect of largely precluding her from pursuing her chosen career?

Yes _____

No _____

If you answered "Yes" to this question, *or* if you answered "Yes" to *all* of the questions in the "Reputation-Plus" section, go on to the next question.

If you answered "No" to this question *and* you also answered "No" to *any* of the questions in the "Reputation-Plus" section, then your deliberations are over.

Please sign this form on the next page so the foreperson can return it to the Court.

**2. 42 U.S.C. § 1983 and Fifth Amendment Procedural Due Process:
Lack of Sufficient Process**

Did Dr. Campbell prove by a preponderance of the evidence that the District deprived her of her constitutionally protected liberty interest without due process?

Yes _____

No _____

If you answered "Yes" to this question, go on to the next question.

If you answered "No" to this question, then your deliberations are over. Please sign this form on the next page so the foreperson can return it to the Court.

3. Compensatory Damages

What amount of compensatory damages, if any, did Dr. Campbell prove by a preponderance of the evidence that she suffered as a result of the District's violation of her right to due process?

\$ _____

UNANIMOUSLY AGREED TO THIS _____ DAY OF _____, 2015.
